



February 5, 2006

Marlene H. Dortch, Secretary Federal Communications Commission 445-12<sup>th</sup> Street, SW. Washington, D.C. 20554

Re: Certification of CPNI Filing EB-06-TC-060 WC Docket No. 05-196

Dear Ms. Dortch:

Transmitted herewith in accordance with the Commission's Public Notice, DA 06-223, released January 30, 2006, and Section 64.2009(e) of the Commission's Rules, is our compliance certificate and accompanying statement for the year ended December 31, 2005.

Sincerely, COMMUNICATION SERVICE, INC.

David J. Robison President



## <u>STATEMENT</u>

Communication Service, Inc. ("CSI") has established operating procedures that ensure compliance with the Federal Communication Commission ('Commission') regulations regarding the protection of consumer proprietary network information ("CPNI").

- CSI has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- CSI continually educates and trains its employees regarding the appropriate use
  of CPNI. CSI has established disciplinary procedures should an employee
  violate the CPNI procedures established by CSI.
- CSI maintains a record of its and its affiliates sales and marketing campaigns
  that use its customers' CPNI. CSI also maintains a record of any and all
  instances where CPNI was disclosed or provided to third parties, or where third
  parties were allowed access to CPNI. The record includes a description of each
  campaign, the specific CPNI that was used in the campaign, and what products
  and services were offered as a part of the campaign.
- CSI has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, CSI's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.





## **CERTIFICATION**

I, David J. Robison, hereby certify this 5<sup>th</sup> day of February, 2006 that I am an officer of Communication Service, Inc., and that I have personal knowledge that Communication Service, Inc. has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §~ 64.2001-2009.

David J. Robison President